

Dennis F. Dunne (admitted *pro hac vice*)
Samuel A. Khalil (admitted *pro hac vice*)
MILBANK LLP
55 Hudson Yards
New York, New York 10001-2163
Telephone: (212) 530-5000
Facsimile: (212) 530-5219

and

Gregory A. Bray (SBN 115367)
Thomas R. Kreller (SBN 161922)
MILBANK LLP
2029 Century Park East, 33rd Floor
Los Angeles, CA 90067
Telephone: (424) 386-4000
Facsimile: (213) 629-5063

*Counsel for the Official Committee
of Unsecured Creditors*

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

**PACIFIC GAS AND ELECTRIC
COMPANY,**

Debtors.

Case No. 19-30088 (DM)

Chapter 11

(Lead Case)

(Jointly Administered)

**JOINDER OF OFFICIAL COMMITTEE OF
UNSECURED CREDITORS TO DEBTORS'
PRELIMINARY RESPONSE IN OPPOSITION
TO WENDY NATHAN'S MOTION FOR
RELIEF FROM THE AUTOMATIC STAY**

- ☐ Affects PG&E Corporation
☒ Affects Pacific Gas and Electric
Company
☐ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM).*

Date: June 11, 2019
Time: 9:30 a.m. (Pacific Time)
Place: United States Bankruptcy Court,
Courtroom 17, 16th Floor
450 Golden Gate Avenue,
San Francisco, CA 94102

Re: Docket Nos. 2048, 2433

1 The Official Committee of Unsecured Creditors (the “Committee”) appointed in the chapter
2 11 cases of the above-captioned debtors-in-possession (collectively, the “Debtors”) hereby supports
3 and joins in the Debtors’ *Preliminary Response in Opposition to Wendy Nathan’s Motion for Relief*
4 *from the Automatic Stay* (the “Preliminary Nathan Opposition”).¹ The Committee reserves all rights
5 to be heard before the Court in connection with the Motion, to amend, supplement, or otherwise
6 modify this Joinder prior to or during the preliminary hearing on the Motion, and to assert such other
7 and further objections prior to the final adjudication of the matter.
8

9 WHEREFORE, for the reasons set forth in the Preliminary Nathan Opposition, the Committee
10 respectfully requests that the Court enter an order: (i) denying Nathan’s request for relief from the
11 automatic stay at this time; (ii) continuing the preliminary hearing on the Motion until at least
12 September 11, 2019; and (iii) granting such other and further relief as is just and proper.
13

14 Dated: June 6, 2019

MILBANK LLP

/s/ Thomas R. Kreller

DENNIS F. DUNNE

SAMUEL A. KHALIL

GREGORY A. BRAY

THOMAS R. KRELLER

*Counsel for the Official Committee of
Unsecured Creditors*

27 ¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the
28 Preliminary Nathan Opposition.